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# STORM REPORT

LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

Volume 9 December 2001

## Understanding Laboratory Data

*First in a series*

**By Kristie Chung**
*Water Resource Control Engineer*

With the rainy season fully underway, your facility has probably already taken its first storm water samples: Congratulations! Now you're ready for the fun part: reviewing your laboratory results and determining whether there is pollution of storm water present on your site. You review the data carefully, and compare them with the benchmark levels (see Frequently Asked Questions in this issue for benchmark levels). If your sampling results exceed the benchmarks, you should try to find out the pollutant sources, and implement the appropriate Best Management Practices (BMPs) to eliminate or reduce the pollution. Your sampling data from subsequent storms should indicate how effective your corrective actions are. The following sections briefly describe three of the most basic monitoring parameters, what may affect their concentrations in the storm water discharge, and what you can do to control it.

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## INSIDE THIS ISSUE



## Pollution Prevention

*Auto Recycling and Salvage*

**By Carlos Urrunaga and RoseLynn Wright**
*Environmental Scientists*

All facilities regulated under the General Permit are required to implement a written site-specific Storm Water Pollution Prevention Plan (SWPPP). One of the major requirements of the SWPPP is to identify and implement best management practices (BMPs) for each potential pollutant and its source. The goal of the storm water program is to prevent or reduce pollutants in both storm water discharges and authorized non-storm water discharges. This is achieved through the effective implementation of the SWPPP and specifically BMPs.

If you own and/or operate an auto dismantling, auto recycling or auto salvage yard, your SWPPP must include descriptions of the BMPs that will be implemented on your site. It should be very clear: where each BMP will be instituted; when each BMP will be maintained; and how each BMP will be maintained. Records should be kept to show what was done and when. The following BMPs are just a few of the pollution prevention techniques, which may be implemented at your site as applicable. BMPs chosen, and their effectiveness may vary per site, as each site is unique, but the same pollution prevention principles should be used at each site.

### General Pollution Prevention

- ✓ Protect all areas with pollutants from rainwater flowing onto the site.
- ✓ Protect all areas with pollutants from rainwater flowing off of the site.
- ✓ Protect all areas from spills or leaks.
- ✓ Protect all areas from rainfall.

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*Understanding Laboratory Data - from page 1*

## Total Suspended Solids

Total Suspended Solids (TSS) measures the undissolved solids in the storm water. TSS can include a wide variety of materials, such as silt, decaying plant and animal matter, industrial wastes and sewage, etc. Flow rate is a primary factor controlling TSS concentrations. Fast running water can disturb and carry more particles and larger-size sediment. Heavy rains can pick up sand, silt, clay and organic particles (such as leaves, soil, tire debris, etc.) from the ground and carry them to the receiving water. Good housekeeping can eliminate or minimize sediments on the ground in contact with the storm water, and therefore reduce the levels of TSS in the storm water discharge. Other structural BMPs, such as retention ponds, vegetation swales, proper grading and pavement of the ground, can also reduce TSS in the storm water discharge.

## Specific Conductance

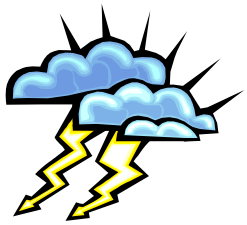
Specific Conductance (SC) is a measure of how well water can carry an electrical current. SC indicates indirectly the presence of dissolved constituents such as chloride, nitrate, sulfate, phosphate, sodium, magnesium, calcium, and iron, and a good indicator of water pollution. The more dissolved constituents the higher the measured SC. If any of the above-listed constituents are present on your site, they should be covered, sealed, contained, and/or stored in a secured area. Likewise, good housekeeping helps to reduce SC in storm water discharges.

## Oil and Grease

Oil and Grease (O&G) measures the amount of oil and grease in the storm water discharge. Many factors can affect the amount of O&G in your storm water discharge, including: oil leaks and spills, mechanical maintenance done outdoors, storage of materials and/or equipment containing residual oil, and washing of vehicles and/or equipment. If you have any of these on you site, immediately eliminate them, or implement appropriate BMPs (i.e., good housekeeping, move the maintenance indoors, contain the washing water, etc.).

More parameters will be discussed in the next newsletter. ❖

# Frequently Asked Questions



## Sampling Concerns

Q: *Where can I get a list of certified laboratories?*

A: Call 213-580-5731 or look on the internet at www.dhs.ca.gov/ps/ls/elap/html/lablist.htm.

Q: *Do I need to submit a copy of my laboratory report to the Los Angeles Regional Water Quality Control Board (Regional Board)?*

A: Yes. The following must be provided for each sample collected:

- Date and time of sample collection.
- Name and title of sampler.
- Parameters tested.
- Name of analytical testing laboratory.
- Discharge location identification.
- Testing results.
- Test methods used.
- Test detection limits.
- Date of testing.
- Copies of the laboratory QA/AC reports.

Q: *What do I need to analyze my storm water samples for?*

A: Each storm water sample must be analyzed for the following:

- pH
- Total Suspended Solids
- Specific Conductance
- Oil and Grease or Total Organic Carbon
- Other pollutants likely to be present in your facility's storm water discharges
- Additional constituents based on SIC code (see table D on pages 40-44 of the General Permit).

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*Pollution Prevention - from page 1*

## General Fluid Concerns

- ✓ Fix or eliminate any leaks.
- ✓ Place drip pans under anything that can leak or where fluids are handled/removed.
- ✓ Have spill kits easily accessible.

## Fluid Use, Transfer and Storage

- ✓ Protect areas where fluids are handled, removed and stored from rainfall.
- ✓ Be very cautious when handling fluids and keep spill kits in close proximity.
- ✓ Any spills shall be immediately cleaned.
- ✓ Fluids should be stored only temporarily, but in sheltered areas with no floor drains.
- ✓ All containers should be on pallets with secondary containment.

  - Primary containment is the container holding the liquid. In the photo (right) drums are the primary containment.
  - Secondary containment is designed to hold the liquid if the first container fails. In the same photo, the secondary containment is a concrete pad and berm (can not be seen on the photo).
- ✓ Inspect as often as possible all areas for leaks or deterioration of fluid storage containers and replace them as necessary.
- ✓ Do not handle drums when it's raining.

## Vehicle Storage

- ✓ All fluid should be drained from vehicles and properly stored for recycling.
- ✓ Inspect and ensure that vehicles don't leak before storing.

## Parts Storage and Cleaning

- ✓ Parts storage areas should be protected from rainfall and flowing water.
- ✓ Parts cleaning should be in self-contained parts washers, with proper disposal of spent solvent. The supplier of the washer or the solvent may have a service to collect waste, or you should collect the waste for offsite disposal at a designated legal disposal facility.
- ✓ Steam cleaning water shall not go to the storm drain or be allowed to soak into the soil. It shall be either disposed of properly per the sanitary sewer agency and its requirements or be contained for offsite disposal at a designated disposal facility.

## Scrap Yards

- ✓ Clean all scrap before putting it in the scrap yard.
- ✓ To prevent excessive rusting of metal, try not to store scrap metals for more than 30 days. ❖

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*Frequently Asked Questions - from page 2*

Q: *You suggested that I compare my sampling analysis results with existing benchmark levels. Where can I find those values?*

A: For many pollutants the USEPA benchmark levels are shown in the following table:

| Parameters | Units | Acceptable Range |
|---|---|---|
| pH | pH units | 6.0-9.0 |
| Total Suspended Solids | mg/L | <100.0 |
| Specific Conductance | µmos/cm | <200.0 |
| Total Organic Carbon | mg/L | <110.0 |
| Oil and Grease | mg/L | <15.0 |
| Biochemical Oxygen Demand | mg/L | <30.0 |
| Chemical Oxygen Demand | mg/L | <120.0 |
| Aluminum | mg/L | <0.75 |
| Ammonia | mg/L | <19.0 |
| Arsenic | mg/L | <0.16854 |
| Cadmium | mg/L | <0.0159 |
| Chloride | mg/L | <860.0 |
| Copper | mg/L | <0.0636 |
| Fluoride | mg/L | <1.8 |
| Iron | mg/L | <1.0 |
| Lead | mg/L | <0.0816 |
| Nickel | mg/L | <1.417 |
| Zinc | mg/L | <0.117 |

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# Regional Board Scrutinizes Monitoring Groups

**By Yi Lu**
*Senior Engineering Geologist*

Section B 15 of the General Permit allows permittees to participate in monitoring groups to comply with the General Permit. The intent of the group monitoring provision is to reduce the monitoring requirements for the group members (group members enjoy a 80% reduction in sampling requirements comparing with non-group members), so that **they can proactively focus their resources on implementing best management practices (BMPs)**.

However, it has come to the attention of the Regional Board, that the group monitoring program may not be functioning properly, as managed by group leaders and/or as implemented by group members. Through increased numbers of compliance inspections and reviews of administrative records, we have discovered noncompliance in several monitoring groups. A few of the problems are as follows:

- Many members failed to sample the storm water as scheduled;
- Some members co-mingled the samples collected from different discharge points, as improperly instructed by their group leaders;
- Some members held their samples longer than the approved holding time;
- Many group leaders failed to keep track of active group members, and the monitoring and inspection schedules;
- Many group leaders failed to provide site-specific SWPPPs and/or BMPs to their members;
- Some group leaders failed to fulfill group leader annual inspections;
- Some group leaders failed to make evaluations and recommendations of clear and specific BMPs in their annual group evaluation reports.

Based on the above review of the group monitoring function, Regional Board staff believe there is a cause for concern about how well group monitoring is functioning to protect water quality. As the result, staff have done, or will be doing, the following:

- Terminated several group members who are not in compliance;
- Targeted group members who fall into the high risk sectors for

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If you need to know the benchmark level for an additional parameter, please call our Storm Water Hotline, 213-576-6753.

Q: *What do I nee to do if my storm water sample data exceed the benchmark levels?*

A: Conduct a thorough site inspection of your facility to determine the sources of pollutants. Pay attention to each activity and areas designated for these activities. Once you've identified the sources, institute additional Best Management Practices that would help reduce or eliminate pollutants in storm water.

Q: *Is lack of rain an acceptable excuse for not sampling?*

A: Yes, if you have valid documentation. We keep rain logs and have access to rain gauge information. To be sure that you don't miss an incoming storm, check the weather forecast, and have your sampling equipment ready. For weather information online, please visit: www.weather.com. 

## Changing Names/Owners/Contacts

Q: *What do we need to do if we changed…*
*… our business name (not the ownership or the operation)?*
*…our phone number?*
*…our mailing address?*
*…our facility site contact?*

A: Complete a Notice of Intent. Be sure to check the "change of information" box, include your WDID number, and highlight the changed information. This form should be sent to:

State Water Resources Control Board
Division of Water Quality
Attn: Storm Water Unit
P.O. Box 1977
Sacramento, CA 95812-1977

Q: *How do I know what contact information the Regional Board has for my site?*

A: The information that we have for your site is based on the Notice of Intent(s) that you sent to the State Board

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*Regional Board Scrutinizes Monitoring Groups - from page 4*

the compliance inspections;

♦ Seriously re-evaluated the group monitoring plan provisions, such as reduced sampling frequencies, as part of the process re-issuing the new General Permit.

♦ Making referrals to the State Board for groups that are not adequately implementing the General Permit requirements, and recommend that the State Board to terminate these groups or require substantial amendments to the group monitoring plans;

Our message to the regulated community is quite clear. If you are a group member, you must be aware of the requirements and help ensure that your group is in compliance with the General Permit. If you are a group leader, you must fulfill your requirements to help your members maintain and achieve compliance with the General Permit. ❖

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*Frequently Asked Questions - from page 4*

(Sacramento). You can view what information we have in our records by visiting us online. Simply point your browser to: www.swrcb.ca.gov/stormwtr/industrial.html and look under "List of Permittees." If any contact information is incorrect, download and complete the Notice of Intent form. Be sure to check the "change of information" box, and send the form to State Board. Keep in mind that change of information is for contact changes only, not for change of ownership or facility location.

## Closing or Leaving A Site

Q: *What if my facility has closed or moved to a new location?*

A: General Permit coverage must continue as long as materials associated with industrial activity remain onsite and are exposed to storm water. Once clean-up activity is completed, and exposure of industrial activities and materials to storm water has been eliminated, submit a completed Notice of Termination to the Regional Board (Los Angeles).

Q: *What should I do if my facility has been sold or transferred to a new owner?*

A: Submit a Notice of Termination to the Regional Board, and be sure to include the new owner or operator's name, phone number and the new facility name. If facility operations under the new owner require coverage under the General Permit, the new owner must submit a Notice of Intent to the State Board.

Q: *What if my facility has merged with another?*

A: If a parent company has taken liability for the facility, then you must submit a Notice of Intent form to the State Board. Be sure to check the "change of information" box, and complete the form with the parent company's information. You may keep your original WDID number. If you do not change the information, you will remain liable for compliance with the General Permit.

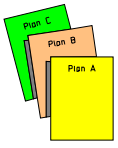
Q: *Do I still need to file a 2001-2002 Annual Report even if I have filed a Notice of Termination during the 2001-2002 permit year?*

A: Yes, you must submit a 2001-2002 Annual Report for anytime that your facility was in operation after July 1, 2001, or you will be in violation and subject to penalties.

Q: *What should I know about inspections of my facility?*

A: In signing the Notice of Intent, you agreed to comply with the General Permit. The permit allows Regional Board, State Board, USEPA, and local storm water management agency staff to inspect your site and to have access to your storm water records related to the General Permit. You have the right to ask for the credential of the inspector, such as a business card or state employee identification card. If you recall from the September issue of Storm Report, USEPA inspectors are currently inspecting some of the industrial facilities in our Region. Regional Board inspectors are also conducting our own inspections. Typically, the inspectors will review your SWPPP, monitoring plan, and other related documents, walk through your site, and evaluate the effectiveness of BMPs implemented at your site.

## Paperwork Matters




Q: *Should I keep copies of Annual Reports, employee training records,*

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*laboratory reports, spill and leak records and other documents related to the General Permit?*

A: Yes. You are required to retain all records of storm water monitoring for a period of five years from the date of sample, measurement, observation or report. All records are public documents and are to be provided to the Regional Board upon request.

Q: *How can I get another copy of the Annual Report or other documents?*

A: All documents are available for download on our website at www.swrcb.ca.gov/stormwtr/industrial.html. Available documents include Annual Report, Notice of Intent, Notice of Termination and the General Permit. You can also fax a written request to 213-576-5777, or call the Storm Water Hotline at 213-576-6753.

Q: *How can I be sure that a document I send to the Regional Board is processed quickly?*

A: There are 5 steps to ensuring that your documents are processed as quickly as possible:

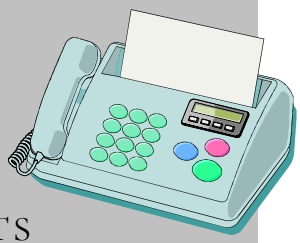
1. Include your WDID number. This is your Waste Discharge Identification number that was assigned to you when you obtained permit coverage. The number begins with 4_19S for the Los Angeles County or 4_56S for the Ventura County.
2. Do not send multiple documents together, especially if they are for different facilities.
3. Fill out forms completely and be sure they are signed.
4. Staple large documents, like the annual report. Binding is not necessary.

Send forms to the right place. State Board (Sacramento) accepts annual fee payments and Notice of Intents. Regional Board (Los Angeles) accepts Notice of Termination, Annual Report, No Exposure Certificate and Sampling and Analysis Reduction Certification.

Q: *How can I get a copy of an earlier Storm Report?*

A: Please visit our website at www.swrcb.ca.gov/rwqcb4/html/programs/stormwater/newletter.html or call our Storm Water Hotline and leave your fax number or address. ❖

## STORM WATER CONTACTS



For Information about the Regional Board's Storm Water Program, and to download forms, please visit our web site: www.swrcb.ca.gov/rwqcb4/html/programs/Stormwater/stormwater.html

You can also call our Storm Water Hotline at 213-576-6753.

If you need to contact the State Board, you may call 916-3441-5536, or send an email to:stormwater@dwq.swrcb.ca.gov

The State Board web site also contains lots of useful information and documents available for downloading: www.swrcb.ca.gov

You can also reach us directly:

REGIONAL BOARD MAIN LINE: 213-576-6600

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Weindy Abarquez, Secretary: 213-576-6802
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Jeff Mack: 213-620-6764
Tracy Woods: 213-576-6684
Matt Yeager: 213-576-6749

PLEASE NOTE the entire Storm Water Section will be moving soon. Our address with remain the same, but our phone numbers will not. The next edition of the newsletter will have our new numbers. Until then, if the above number does not work, please call our main line at 213-576-6600 and they will gladly connect you.❖


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ADDRESS CORRECTION REQUESTED